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Attorneys for Defendant
Coolvision, Ltd.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

WAG ACQUISITION, L.L.C.,

Plaintiff,

v.

SOBONITO INVESTMENTS, LTD.,
COOLVISION, LTD., I.M.L. SLU, and
DOES 1-20.

Defendants.

Civil Action No. 2:14-cv-01661-ES-
JAD

**APPLICATION FOR EXTENSION
OF TIME TO ANSWER, MOVE OR
OTHERWISE RESPOND
PURSUANT TO LOCAL CIVIL
RULE 6.1(b)**

Application is hereby made, pursuant to Local Civil Rule 6.1(b), for a Clerk's Order extending for fourteen (14) days the time within which defendant Coolvision, Ltd. ("Coolvision"),¹ by and through its undersigned attorneys, Kelley Drye & Warren LLP, may answer, move or otherwise respond to the First Amended Complaint for Patent Infringement ("Amended Complaint") filed by plaintiff, WAG Acquisition, LLC ("WAG") and it is represented that:

¹ Coolvision hereby reserves its right to assert any defenses under Fed. R. Civ. P. 12(b) that may be applicable in this action.

- (1) no previous extension has been obtained;
- (2) WAG filed the original Complaint in this action on or about March 14, 2014 and the Amended Complaint on or about April 24, 2014;
- (3) WAG attempted service of the Amended Complaint on Coolvision, a foreign entity, on May 12, 2014;
- (4) The summons has neither been returned nor executed on the docket;
- (5) Assuming proper service (which Coolvision does not at this time concede), pursuant to Fed. R. Civ. P. 12(a)(1)(A)(i), Coolvision's time to answer, move or otherwise respond to WAG's Amended Complaint currently would expire on June 2, 2014; and
- (6) with the Clerk's extension requested herein, Coolvision's time to respond to the Amended Complaint will be extended up to and including June 16, 2014.

Dated: May 30, 2014

/s/ Joseph D. Wilson
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*Attorneys for Defendant
Coolvision, Ltd.*

ORDER

The above Application is ORDERED GRANTED and the time in which defendant Coolvision, Ltd. may answer, move or otherwise respond to the Amended Complaint filed by Plaintiff WAG Acquisition, LLC, be and hereby is extended from June 2, 2014 to June 16, 2014.

WILLIAM T. WALSH, Clerk

By: _____

Deputy Clerk

CERTIFICATE OF SERVICE

I hereby certify that on this date, a true copy of the foregoing Application For an Extension of Time to Answer, Move or Otherwise Respond Pursuant to Local Civil Rule 6.1(b), was served upon Plaintiff WAG Acquisition, LLC's counsel via ECF.

/s/ Joseph D. Wilson

Joseph D. Wilson

Dated: May 30, 2014